

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**JEROME CORSI,**

**Plaintiff,**

**v.**

**ROBERT MUELLER, individually and in  
his official capacity as Special Counsel,  
FEDERAL BUREAU OF  
INVESTIGATION, NATIONAL  
SECURITY AGENCY, CENTRAL  
INTELLIGENCE AGENCY, UNITED  
STATES DEPARTMENT OF JUSTICE,  
JEFF BEZOS, THE WASHINGTON  
POST, and MANUEL ROIG-FRANZIA,**

**Defendants.**

**Civil Action No. 1:18-cv-2885-ESH**

**CONSENT MOTION FOR EXTENSION OF TIME  
FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendants WP Company LLC d/b/a The Washington Post (the “Post”), Manuel Roig-Franzia and Jeff Bezos, (collectively, “Post Defendants”), by their undersigned counsel, respectfully move this Court for an extension of time for them to answer or otherwise respond to the Amended Complaint filed by Jerome Corsi to and including June 12, 2019 and that, in the event the Court grants Plaintiff’s forthcoming motion for leave to file a Second Amended Complaint, that the Post Defendants’ deadline to answer or otherwise respond to the Second Amended Complaint be set as the same date—June 12, 2019. The Post Defendants’ counsel has conferred with Plaintiffs’ counsel pursuant to Local Rule 7(m), and Plaintiffs’ counsel has consented to this request.

On April 29, 2019, the Court granted the Post Defendants’ consent motion for an extension of time to answer or otherwise respond to the Amended Complaint to May 14, 2019.

That extension was requested in an abundance of caution in light of the fact that Plaintiff's counsel had stated that Plaintiff intended to imminently file a motion to for leave to file a Second Amended Complaint, which would render the Post Defendants' deadline to respond to the first Amended Complaint moot. To date, Plaintiff has not filed a motion for leave to file a Second Amended Complaint.

The parties have conferred further, and Plaintiff states that he will be filing a motion for leave to file a Second Amended Complaint no later than May 17, 2019, and that, in the event that motion is granted, he agrees to an extension of the Post Defendants' deadline to answer the Second Amended Complaint to June 12, 2019. The Post Defendants respectfully request that, if Plaintiff files his motion for leave by May 17, 2019, and the Court grants said motion, the Post Defendants' deadline to answer or respond to the Second Amended Complaint be set as June 12, 2019.

This is the Post Defendants' second request for an enlargement of time. There are no other deadlines in this case that will be affected by this extension.

WHEREFORE, the Post Defendants respectfully request that the Court grant their motion, and that the deadline for the Post Defendants to answer or otherwise respond to the first Amended Complaint be extended to and including June 12, 2019, and, if Plaintiff files a motion for leave to file a Second Amended Complaint by May 17, 2019, and the Court grants said motion, that the deadline for the Post Defendants to answer or otherwise respond to a Second Amended Complaint be set as June 12, 2019.

Dated: April 29, 2019

Respectfully submitted,

/s/ Laura R. Handman

Laura R. Handman (DC Bar No. 444386)  
Eric J. Feder (DC Bar No. 1048522; admission  
to this Court pending)  
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d/b/a The Washington Post, Manuel Roig-  
Franzia, and Jeff Bezos*

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**Defendants.**

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**PROPOSED ORDER**

Upon consideration of the Consent Motion for Extension of Time to Answer or Otherwise Respond to the Complaint filed herewith by Defendants WP Company LLC d/b/a The Washington Post, Manuel Roig-Franzia, and Jeff Bezos (the “Post Defendants”), it is

ORDERED that Defendants’ motion is granted, and that the deadline for the Post Defendants to answer or otherwise respond to the Amended Complaint is extended to June 12, 2019, and it is further

ORDERED that, if Plaintiff files a motion for leave to file a Second Amended Complaint by May 17, 2019, and the Court grants said motion, that the deadline for the Post Defendants to answer or otherwise respond to the Second Amended Complaint be set as June 12, 2019.

Dated this \_\_\_\_ day of \_\_\_\_\_, 2019.

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Hon. Ellen S. Huvelle  
United States District Judge

**CERTIFICATE OF SERVICE**

This is to certify that I have this 13th day of May, 2019, electronically filed the foregoing Consent Motion for Extension of Time to Answer or Otherwise Respond to the Complaint using the CM/ECF system and served upon counsel of record by electronic filing.

/s/ Laura R. Handman

Laura R. Handman